



DEPARTMENT OF PARKS AND RECREATION
Orange Coast District
3030 Avenida Del Presidente
San Clemente CA 92672
(949) 492-0802

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RESOURCES AGENCY OF CALIFORNIA

Ruth G. Coleman, Director

November 6, 2009

MLPA Initiative
c/o California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: MLPA Initiative Process
Potential Impacts to Crystal Cove State Park / Doheny State Beach

Dear Blue Ribbon Task Force Members,

The purpose of this letter is to communicate the concerns of California State Parks, Orange Coast District, regarding the South Coast Study Region - Marine Life Protection Act (MLPA) Initiative proposals currently being considered by the Blue Ribbon Task Force (BRTF) and their potential impacts to Doheny State Beach and Crystal Cove State Park. As previously noted in our letter dated October 13, 2009, our expectation of the MLPA process is for increased levels of protection, or at least retention of existing levels, for both Doheny State Beach and Crystal Cove State Park.

The latest options currently under review include several proposed components which are not fully consistent with state park management goals, objectives, general plans, and policies including: Loss of a Marine Protected Area (MPA) designation for Doheny State Beach and its designated underwater park; a shoreline boundary split at Crystal Cove State Park (Reef Point) and its designated underwater park; and increased levels of commercial take within the proposed remaining State Marine Conservation Area (SMCA) at Crystal Cove State Park and its designated underwater park. Again, we do not support any proposal which diminishes the existing marine protection levels at Doheny State Beach or Crystal Cove State Park.

As both a trustee and managing agency overseeing nearly 30% of the State's coastline, State Parks has a responsibility to ensure that MPA proposals are consistent with management objectives of existing state park units and to evaluate those MPAs proposed for inclusion into the park system for consistency with State Park policies, goals and objectives. In reviewing the proposed MPAs, our primary considerations are: 1) Consistency of the proposed MPA designation with State Park unit purpose; 2)

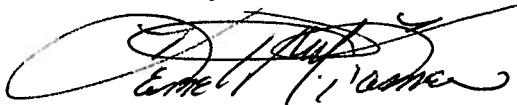
Recognizable boundaries for management; 3) Non-adjacent proposed SMPs and SMRs and; 4) Existing State Park underwater units.

Both Doheny State Beach and Crystal Cove State Park have benefited from long-term investments and commitments to preserving marine resources, providing public access and educational opportunities, and enforcement of applicable laws. Our marine protection efforts, such as common signage, interpretation, science monitoring and enforcement training, are currently in sync with surrounding city neighbors including Newport Beach, Laguna Beach, Dana Point, and the County of Orange. State Parks intends to maintain Underwater Park leases from State Lands regardless of how MPA designations may change. It is also our intent to continue Underwater Park and intertidal resource management efforts to the maximum extent possible.

Accordingly, we are requesting that the Blue Ribbon Task Force support an option(s) which accomplishes the following: 1) Maintains an MPA designation at Doheny State Beach; 2) Ensures full intertidal protection in all MPAs; 3) Designates one contiguous MPA for Crystal Cove State Park; 4) Maintains existing levels, reduces, or eliminates commercial take for MPA designations at Doheny State Beach and Crystal Cove State Park; 5) Specifies regulations with limited recreational take for game species.

Thank you for your efforts and consideration. If you require additional information or would like to discuss this matter further, please feel free to contact me at (949) 492-0802.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth M. Kramer", written over a horizontal line.

Kenneth M. Kramer
District Superintendent

Cc: Mr. Kevin Fleming
DPR - Natural Resource Division